

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSHUA DWANE BACON,	Removed from the Court of Common Pleas
Plaintiff, <i>pro se</i> ,	of Luzerne County Civil No. 2023-03307
v.	[JUDGE MARIANI]
LUZERNE COUNTY, et al.,	NO. 3:23-CV-01699-RDM-CA
Defendants,	Filed via U.S. Mail on July 1, 2024

**MOTION FOR APPOINTMENT OF COUNSEL**

Plaintiff, JOSHUA DWANE BACON, respectfully comes before this Court and represents the following:

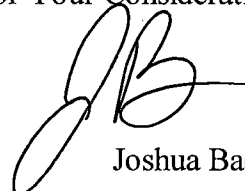
1. Plaintiff's Complaint has now survived Motion To Dismiss.
2. Plaintiff's Complaint contains complex legal issues which he is unprepared and unable to successfully argue at trial.
3. Plaintiff is indigent, *pro se*, incarcerated, and <sup>without</sup>~~without~~ the resources to mount a proper defense.
4. Plaintiff has requested *pro bono* counsel from this Court before and was denied.
5. WHEREFORE, Plaintiff requests to be placed on a waiting list for *pro bono* representation and for his case to be "frozen" pending appointment of counsel.

Respectfully Submitted For Your Consideration,

**FILED**  
**SCRANTON**

JUL 11 2024

PER    
DEPUTY CLERK

  
Joshua Bacon

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**MOTION FOR APPOINTMENT OF COUNSEL**

I, JOSHUA DWANE BACON, hereby certify that on Monday, July 1, 2024, I served a copy of the foregoing, MOTION FOR APPOINTMENT OF COUNSEL, upon the persons indicated below via U.S. Mail:

United States District Court for the Middle District of Pennsylvania  
235 N. Washington Ave  
PO Box 1148  
Scranton, PA 18507-1148

**Dougherty, Levanthal, & Price, LLP**  
**Attorney Sean P. McDonough**

**Was NOT served with a copy of this document pursuant to the reduced copies motion that was approved.**

Respectfully Submitted For Your Consideration,



Joshua Bacon

Smart Communications/PADOC

SCI-CHS

Name Bacon

Number QN6521

PO Box 33028

St Petersburg FL 33733



United States District Court  
Middle District of Pennsylvania  
235 N. Washington Ave  
Scranton, PA [REDACTED]

RECEIVED  
SCRANTON

JUL 11 2024

PER [Signature]

DEPUTY CLERK

